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February 11, 2005

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Re: Follow-up questions regarding the Westwing incident report: Emergency preparedness/training of APS personnel prior to and after the fire; firewall implementation delay. Docket No. E-00000J-04-0522

Dear Sirs:

I have had the opportunity to read the investigative report on the events of the summer of 2004, including the catastrophic Westwing fire. As you can imagine, a report covering so many issues and generating numerous recommendations has engendered further questions, some of which I will hold in reserve until the upcoming third oversight hearing into this matter.

However, I would like the report's signatories to answer several questions prior to the oversight hearing. In particular, I have a number of questions regarding the parties' policies on emergency preparedness training and drilling, both prior to and after the Westwing fire.

- In an *Arizona Republic* article dated 1/22/05, APS' Jan Bennett stated that the employees who engaged in the miscommunication that was said to be partly to blame for excessive

energy being routed into T1 have not been disciplined but have been “coached how to prevent such a problem in the future.” Please identify the dates of these coaching sessions, and how many of APS’ Emergency Control Operations Center operators have been provided this training.

- As you know, APS is a member of the North America Electric Reliability Council (NERC) which has promulgated standards regarding emergency operator training, preparedness and certification. NERC requires that operating authorities like APS provide their system operators with a “coordinated training program that is designed to promote reliable operation.” (See ftp://www.nerc.com/pub/sys/all_updl/oc/opman/policy8.doc.) According to NERC, among other things, this program should include a training plan, objectives, training time, training staff, and verification of achievement. Please tell me whether APS has ever implemented such a training program for its operators, as well as whether any of the individuals who were on duty at the ECC during the Westwing incident had received this kind of emergency procedures training. Please provide the Commission with documentation of your training program.
- Please provide to the Commission a copy of APS’ ECC Supervisor Training Program manual, and any information regarding your “Black Start” procedures. In particular, has APS taken any steps to coordinate Black Start procedures with SRP, WAPA, and TEP? Have the parties ever discussed or internally addressed the difficulty of recovery should power suddenly not be available from California or WECC states and Arizona be forced to rely on power from Glen Canyon dam hydro power for a restart, and how long such a restart would take?
- Has APS, SRP, WAPA or TEP ever conducted a comprehensive Black Start drill?
- Please provide the Commission with information regarding the number of crews you have in the field at all times and the number of personnel you have in your ECC and how that compares with any relevant NERC requirements or other similarly situated utilities’ ECC operations.
- The Westwing fire investigation report prepared by APS’ Jeff Court states that among the Corrective Actions being taken are the review and testing of operators on NERC policy #5 and review of NERC’s “Electrical System Restoration Reference Document”. Were these NERC policies ever reviewed or tested on prior to the fire?

Additionally, I have several follow up questions arising out of the parties’ response to my letter regarding information contained in the Westwing Engineering and Operations Committee meeting minutes.

As you know, I asked why there were at least two delays in designing and implementing firewalls at Westwing, and in particular why the Western Area Power Authority did not name a representative to the E&O subcommittee tasked with implementing the firewalls. In response, the parties stated in their joint letter of January 3 that they believe the failure of the committee to meet as a result of the WAPA designee never being formally named did not cause the delay in firewall implementation because under no circumstance could firewalls have been designed and implemented during the time prior to the fire. The Department of Energy further stated that it disagrees that it failed to appoint a subcommittee member, as it informally notified the chair of

Mr. William Post, et al
February 11, 2005
Page 3

the subcommittee of the name of their designee in October 2003 during a "side discussion" following a regularly scheduled coordination meeting with APS.

I would like to know whether the Department of Energy is correct that it did, in fact, name a designee to the subcommittee and if so why the sub-committee did not meet when that person was named. Please also tell me who the designee was and who provided that person's name to the chair of the committee.

Furthermore, during the course of the second oversight hearing, a representative for one of the Westwing owners stated that firewalls can be implemented in six months. Given these statements made during the hearings, please tell me why you are now saying that firewalls could not, under any circumstances, have been installed prior to the fire at Westwing.

I would like each of the owners of Westwing to respond to these questions separately.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kris Mayes', with a stylized, cursive script.

Kris Mayes
Commissioner

Cc: Chairman Jeff Hatch-Miller
Commissioner William A. Mundell
Commissioner Marc Spitzer
Commissioner Mike Gleason
Brian McNeil
Ernest Johnson
Heather Murphy